

No. HKTEC2102439302

Date: 28 Jun 2021

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PALM COMMODITIES INTERNATIONAL LLC

1717 JP HENNESSY DR LAVERGNE, TN 37086

This report supersedes all previous documents bearing the test report number HKTEC2102439301 with amendment in page 9 to page 19 by adding information of flowchart.

The following sample(s) was/were submitted and identified on behalf of the clients as : NICKEL SULFAMATE SOLUTION LOT 21111SNC

SGS Job No. :	4774020 - HK
Date of Sample Received :	26 May 2021
Testing Period :	26 May 2021 - 21 Jun 2021
Test Requested :	Selected test(s) as requested by client.
Test Method :	Please refer to next page(s).
Test Results :	Please refer to next page(s).
Conclusion :	Based on the performed tests on submitted sample(s), the results of Cadmium, Lead, Mercury, Hexavalent chromium, Polybrominated biphenyls (PBBs), Polybrominated diphenyl ethers (PBDEs) and Phthalates such as Bis(2-ethylhexyl) phthalate (DEHP), Butyl benzyl phthalate (BBP), Dibutyl phthalate (DBP) and Diisobutyl phthalate (DIBP) comply with the limits as set by RoHS Directive (EU) 2015/863 amending Annex II to Directive 2011/65/EU.
	Based on the performed tests on submitted samples, the test results do not exceed the limit as set by the requirement of European Regulation POPs (EU) 2019/1021–Hexabromocyclododecane (HBCDD) and all major diastereoisomers identified (α -HBCDD, β -HBCDD, γ -HBCDD).
	Based on the performed tests on submitted sample(s), the test results do not exceed the limit as set by European Regulation POPs (EU) 2020/784 amending to Regulation (EU) 2019/1021 - PFOA and its salts, PFOA-Related Substances , PFOS and its derivatives.

Signed for and on behalf of SGS Hong Kong Limited.

Lam Ka Yung, Allen Chemist

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Test Results :

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Test Part Description :

Specimen	SGS Sample ID	Description
No.		
1	HKT21-024393.001	Green liquid

Remarks :

(1) 1 mg/kg = 1 ppm = 0.0001%(2) MDL = Method Detection Limit (3) ND = Not Detected (< MDL) (4) "-" = Not Regulated

RoHS Directive (EU) 2015/863 amending Annex II to Directive 2011/65/EU

Test Method : With reference to IEC 62321-4:2013+A1:2017, IEC62321-5:2013, IEC62321-7-2:2017, IEC62321-6:2015 and IEC62321-8:2017, analyzed by ICP-OES, UV-Vis and GC-MS. (Decision Rule: please refer to appendix 1: Category 1)

<u>Test Item(s)</u>	<u>Limit</u>	<u>Unit</u>	<u>MDL</u>	<u>001</u>
Cadmium (Cd)	100	mg/kg	2	ND
Lead (Pb)	1,000	mg/kg	2	ND
Mercury (Hg)	1,000	mg/kg	2	ND
Hexavalent Chromium (Cr(VI))	1,000	mg/kg	8	ND
Sum of PBBs	1,000	mg/kg	-	ND
Monobromobiphenyl	-	mg/kg	5	ND
Dibromobiphenyl	-	mg/kg	5	ND
Tribromobiphenyl	-	mg/kg	5	ND
Tetrabromobiphenyl	-	mg/kg	5	ND
Pentabromobiphenyl	-	mg/kg	5	ND
Hexabromobiphenyl	-	mg/kg	5	ND
Heptabromobiphenyl	-	mg/kg	5	ND
Octabromobiphenyl	-	mg/kg	5	ND
Nonabromobiphenyl	-	mg/kg	5	ND
Decabromobiphenyl	-	mg/kg	5	ND
Sum of PBDEs	1,000	mg/kg	-	ND
Monobromodiphenyl ether	-	mg/kg	5	ND
Dibromodiphenyl ether	-	mg/kg	5	ND
Tribromodiphenyl ether	-	mg/kg	5	ND
Tetrabromodiphenyl ether	-	mg/kg	5	ND
Pentabromodiphenyl ether	-	mg/kg	5	ND

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<u>Test Item(s)</u>	<u>Limit</u>	<u>Unit</u>	<u>MDL</u>	<u>001</u>	
Hexabromodiphenyl ether	-	mg/kg	5	ND	
Heptabromodiphenyl ether	-	mg/kg	5	ND	
Octabromodiphenyl ether	-	mg/kg	5	ND	
Nonabromodiphenyl ether	-	mg/kg	5	ND	
Decabromodiphenyl ether	-	mg/kg	5	ND	
Dibutyl Phthalate (DBP)	1,000	mg/kg	50	ND	
Benzylbutyl Phthalate (BBP)	1,000	mg/kg	50	ND	
Bis-(2-ethylhexyl) Phthalate (DEHP)	1,000	mg/kg	50	ND	
Diisobutyl Phthalate (DIBP)	1,000	mg/kg	50	ND	

Notes :

(1) The maximum permissible limit is quoted from RoHS Directive (EU) 2015/863.
IEC 62321 series is equivalent to EN 62321 series
http://www.cenelec.eu/dyn/www/f?p=104:30:1742232870351101::::FSP_ORG_ID,FSP_LANG_ID: 1258637,25

<u>Halogen</u>

Test Method : With reference to EN 14582:2016, analysis was performed by IC.

<u>Test Item(s)</u>	<u>Limit</u>	<u>Unit</u>	MDL	<u>001</u>
Fluorine (F)	-	mg/kg	50	ND
Chlorine (Cl)	-	mg/kg	50	ND
Bromine (Br)	-	mg/kg	50	ND
lodine (I)	-	mg/kg	50	ND

Notes :

(1) The measurement report of the expanded uncertainty with confident level 95% by coverage factor k=2, is 20% for each analyte of Fluorine, Chlorine, Bromine and Iodine.

Element(s)

Test Method : With reference to US EPA Method 3052:1996. Analysis was performed by ICP-OES.

<u>Test Item(s)</u>	<u>Limit</u>	<u>Unit</u>	MDL	<u>001</u>
Iron (Fe)	-	mg/kg	10	ND
Arsenic (As)	-	mg/kg	10	ND
Antimony (Sb)	-	mg/kg	10	ND
Beryllium (Be)	-	mg/kg	5	ND

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Notes :

(1) The measurement report of the expanded uncertainty with confident level 95% by coverage factor k=2, is 20% for each analyte of Arsenic, Antimony, Beryllium and Iron.

PVC (Polyvinyl chloride)

Test Method : SGS inhouse method-CTS-EC-215-1, analysis was performed by IC and Pyrolysis GC-MS

<u>Test Item(s)</u>	<u>Limit</u>	<u>Unit</u>	MDL	<u>001</u>
PVC	-	% (w/w)	0.05	ND

Organotin compounds

Test Method : With reference to BS ISO 17353:2004. Analysis was conducted by GC-MS. (Decision Rule: please refer to appendix 1: Category 1)

<u>Test Item(s)</u>	<u>Unit</u>	<u>MDL</u>	<u>001</u>
Triphenyltin (TPhT) by weight of Tin	%	0.01	ND
Tricyclohexyltin (TCyT) by weight of Tin	%	0.01	ND
Diphenyltin (DPhT) by weight of Tin	%	0.01	ND
Monophenyltin (MPhT) by weight of Tin	%	0.01	ND
Dibutyltin (DBT) by weight of Tin	%	0.01	ND
Di-octyltin (DOT) by weight of Tin	%	0.01	ND
Monobutyltin (MBT) by weight of Tin	%	0.01	ND
Monooctyltin (MOT) by weight of Tin	%	0.01	ND
Tetrabutyltin (TTBT) by weight of Tin	%	0.01	ND

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Tetrabromobisphenol A (TBBP-A)

Test Method : With reference to In-house method-CTS-SL-229-1. Analysis was performed by GC-MS.

Test Item(s)	<u>CAS NO</u>	<u>Limit</u>	<u>Unit</u>	<u>MDL</u>	<u>001</u>
Tetrabromobisphenol A	79-94-7	-	mg/kg	5	ND
(TBBP-A)					

Notes :

(1) The measurement report of the expanded uncertainty with confident level 95% by coverage factor k=2, is 30% for Tetrabromobisphenol A.

Bisphenol-A

Test Method : With reference to In-house method-CTS-HL-229-1. Analysis was performed by HPLC-MS-MS.

<u>Test Item(s)</u>	CAS_NO	<u>Limit</u>	<u>Unit</u>	MDL	<u>001</u>
Bisphenol-A	80-05-7	-	mg/kg	0.1	ND

Notes :

(1) The measurement report of the expanded uncertainty with confident level 95% by coverage factor k=2, is 20% for bisphenol A.

European Regulation POPs (EU) 2019/1021 – Hexabromocyclododecane (HBCDD) and all major diastereoisomers identified (α-HBCDD, β-HBCDD, γ-HBCDD)

Test Method : With reference to SGS inhouse method-CTS-SL-235-1, analysis was performed by GC-MS. (Decision Rule: please refer to appendix 1: Category 1)

Test Item(s)	<u>Limit</u>	<u>Unit</u>	MDL	<u>001</u>
Hexabromocyclododecane (HBCDD) and all major	100	mg/kg	10	ND
diastereoisomers identified (α-HBCDD, β-HBCDD,				
γ-HBCDD)				
Conclusion				PASS

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European Regulation POPs (EU) 2020/784 amending to Regulation (EU) 2019/1021 - PFOA and its salts, PFOA-Related Substances, PFOS and its derivatives

Test Method : With reference to CEN/TS15968:2010, analysis was performed by LC-MS or LC-MS/MS and GC-MS. (Decision Rule: please refer to appendix 1: Category 1)

<u>Test Item(s)</u>	<u>CAS NO</u>	<u>Limit</u>	<u>Unit</u>	<u>MDL</u>	<u>001</u>
Perfluorooctanoic acid (PFOA)		0.025	mg/kg	0.010	ND
and its salts+					
PFOA-related substances		1	mg/kg	-	ND
1H,1H,2H,2H-Perfluoro-1-	39108-34-4	-	mg/kg	1	ND
decanol (8:2 FTS)	070 07 0			4	
Methyl perfluorooctanoate	376-27-2	-	mg/kg	1	ND
(Me-PFOA)	2100 24 5		ma/ka	1	
Ethyl perfluorooctanoate (Et-PFOA)	3108-24-5	-	mg/kg	I	ND
1H,1H,2H,2H-Perfluoro-1-	678-39-7	-	mg/kg	1	ND
decanol (8:2 FTOH)					
1H,1H,2H,2H-Perfluorodecyl	27905-45-9	-	mg/kg	1	ND
acrylate (8:2 FTA)					
1H,1H,2H,2H-Perfluorodecyl	1996-88-9	-	mg/kg	1	ND
methacrylate (8:2 FTMA)					
Perfluoro-1-iodooctane (PFOI)	507-63-1	-	mg/kg	1	ND
Perfluorooctane sulfonates		10	mg/kg	-	ND
(PFOS) and its derivatives					
Perfluorooctane sulfonates	1763-23-1	-	mg/kg	1	ND
(PFOS) [^]					
N-ethylperfluoro-1-	4151-50-2	-	mg/kg	1	ND
octanesulfonamide (EtFOSA)					
N-methylperfluoro-1-	31506-32-8	-	mg/kg	1	ND
octanesulfonamide (MeFOSA)	4004 00 0			4	
2-(N-ethylperfluoro-1-	1691-99-2	-	mg/kg	1	ND
octanesulfonamido)-ethanol (EtFOSE)					
2-(N-methylperfluoro-	24448-09-7		mg/kg	1	ND
1-octanesulfonamido) -ethanol	24440-03-7	-	шу/ку	I	ND
(MeFOSE)					
Perfluorooctane sulfonamide	754-91-6	_	mg/kg	1	ND
(PFOSA)				•	
Conclusion					PASS

Notes :

(1) + PFOA refer to its salts including PFOA-Na (CAS No.: 335-95-5), PFOA-K (CAS No.: 2395-00-8),

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 PFOA-Ag (CAS No.: 335-93-3), PFOA-F (CAS No.: 335-66-0) and APFO (CAS No.: 3825-26-1);
 (2) ^ PFOS refer to its derivatives including PFOS-K (CAS No.: 2795-39-3), PFOS-Li (CAS No.: 29457-72-5), PFOS-NH4 (CAS No.: 29081-56-9), PFOS-NH(OH)2 (CAS No.: 70225-14-8),
 PFOS-N(C2H5)4 (CAS No.: 56773-42-3), PFOS-DDA(CAS No.: 251099-16-8) and POSF (CAS No.: 307-35-7)

Phthalates

Test Method : With reference to EN14372: 2004. Analysis was performed by GC-MS.

<u>Test Item(s)</u>	CAS NO	<u>Limit</u>	<u>Unit</u>	MDL	<u>001</u>
Diisononyl Phthalate (DINP)	28553-12-0 /	-	%	0.010	ND
	68515-48-0				
Di-n-octyl Phthalate (DNOP)	117-84-0	-	%	0.003	ND
Diisodecyl Phthalate (DIDP)	26761-40-0 /	-	%	0.010	ND
	68515-49-1				
Di-n-hexyl Phthalate (DnHP)	84-75-3	-	%	0.003	ND

Notes :

(1) The measurement report of the expanded uncertainty with confident level 95% by coverage factor k=2, is 25% for each analyte of Phthalates.

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Appendix 1

Category	Decision Rule Statement
1	 The decision rule for conformity reporting is based on the non-binary statement with guard band (is equal to the expanded measurement uncertainty with a 95% coverage probability, w = U95) in ILAC-G8:09/2019 Clause 4.2.3. A. "Pass - the measured value is within (or below / above) the acceptance limit, where the acceptance limit is below / above to the guard band." or "Pass - The measured values were observed in tolerance at the points tested. The specific false accept risk is up to 2.5%.". B. "Conditional Pass - The measured values were observed in tolerance at the points tested. However, a portion of the expanded measurement uncertainty intervals about one or more measured values exceeded / out of tolerance. When the measured result is close to the tolerance, the specific false accept risk is up to 50%.". C. "Conditional Fail - One or more measured values were observed out of tolerance at the points tested. However, a portion of the expanded measurement uncertainty intervals about one or more measured values were in tolerance. When the measured result is close to the tolerance, the specific false accept risk is up to 50%.". D. "Fail - He measured value is out of (or below / above) the tolerance limit added / subtracted to the guard band." or "Fail - One or more measured values were observed out of tolerance at the points tested". The specific false reject risk is up to 50%.".
2	The decision rule for conformity reporting is based on BS EN 1811:2011+A1:2015: Reference test method for release of nickel from all post assemblies which are inserted into pierced parts of the human body and articles intended to come into direct and prolonged contact with the skin in Section 9.2 interpretation of results.
3	The decision rule for conformity reporting is based on the general consideration of simple acceptance as stated in ISO/IEC Guide 98-3: "Uncertainty of measurement - Part 3: Guide to the expression of uncertainty in measurement (GUM 1995)", and more specifically for analytical measurements to the EURACHEM/CITAC Guide 2012 "Quantifying Uncertainty in Analytical Measurement ".
4	The decision rule for conformity reporting is according to the IEC 62321-7-1 Edition 1.0 2015-09 Section 7: Table 1-(comparison to standard and interpretation of result)
5	The decision rule for conformity reporting is according to the IEC 62321-3-1 Edition 1.0 2013-06 Annex A.3 interpretation of result.
6	The decision rule for conformity reporting is according to the GB/T 26125-2011 Annex A to H
7	The decision rule for conformity reporting is according to the requested specification or standard (ASTM F963-17 section 4.3.5)
8	The decision rule for conformity reporting is according to the requested specification or standard (AS/NZS ISO 8124 Part 3 section 4.2)
Remark	If the decision rule is not feasible to be used and the uncertainty of the result is able to be provided, the uncertainty range of the result will be shown in the report. Otherwise, only result will be shown in the report.

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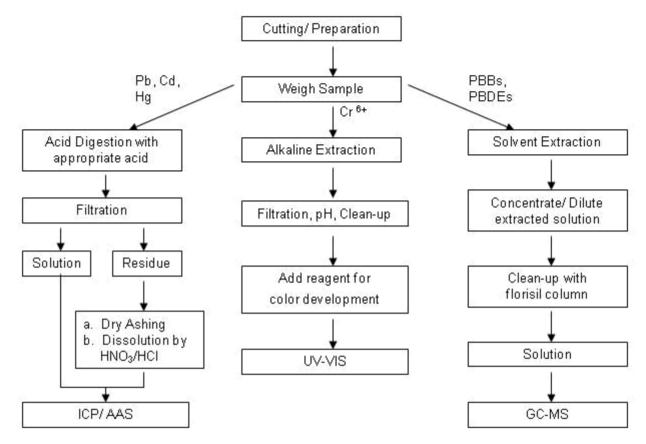
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Flowchart:



Note : 1) Boiling water test method was also performed for the analysis of Cr (VI) in metal sample.

 The polymeric samples were dissolved totally by pre-conditioning method according to above flow chat for Cd, Pb and Hg contents analysis.

Operator :	Chiu Kan Yuen/ Tang Koon Pang (Acid digestion)		
	Chiu Kan Yuen (Dry Ashing)		
	Nick Liu (Hexavalent Chromium)		
	Kent Wan (PBBs and PBDEs)		
Section Chief :	Chan Chun Kit, Dickson		

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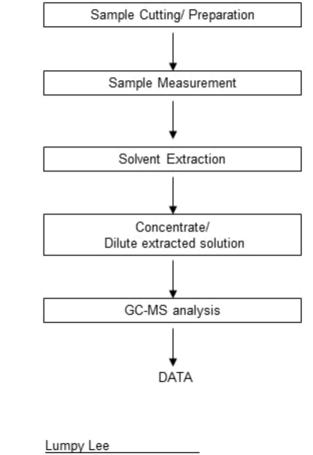


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Flowchart for Phthalates measurement

Method: IEC 62321-8:2017



Tested by : Lumpy Lee Checked by : Edmund Kwan

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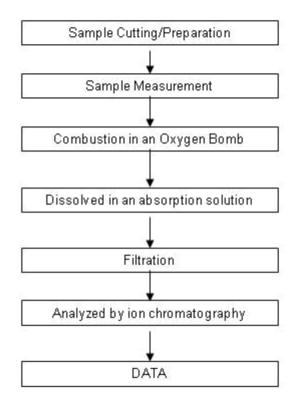


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Flowchart for Halogen Free Test

Method: BS EN14582:2016



Operator :	Tang Ying Sam			
Supervisor:	<u>Chan Chun Kit (Dickson)</u>			

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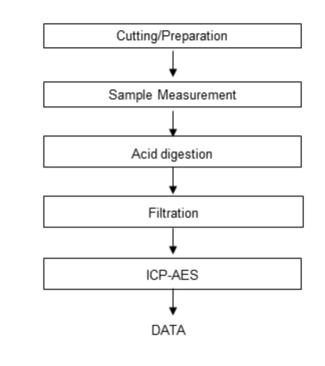


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Flowchart of Digestion for Element Measurement

Method: EPA Method 3051A/3052





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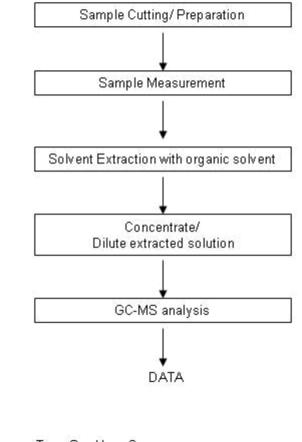


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Flowchart for HBCDD measurement

Method: In-house Method



Tested by	25	Tang Sze Hon, Gary
Checked by	<u>s</u>	Fok Chi Shan

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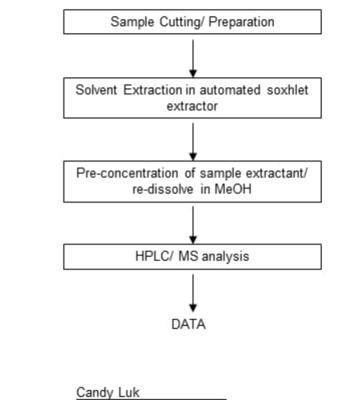
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Flowchart for PFOS/ PFOA measurement

Method: CEN/TS15968:2010



 Operator :
 Candy Luk

 Chief Supervisor :
 Yu Ka Lai

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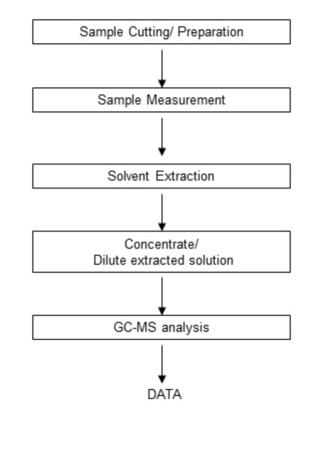


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Flowchart for Phthalates measurement

Method: EN 14372



Tested by : Checked by : Lumpy Lee Edmund Kwan

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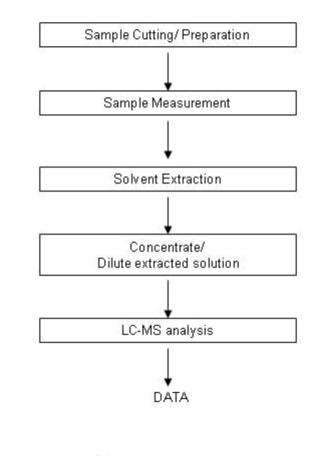


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Flowchart for Bisphenol A measurement

Method: In-house method



Tested by	25	Chan Yin Suet	
Checked by	ø	Chow Cheong Wing	28

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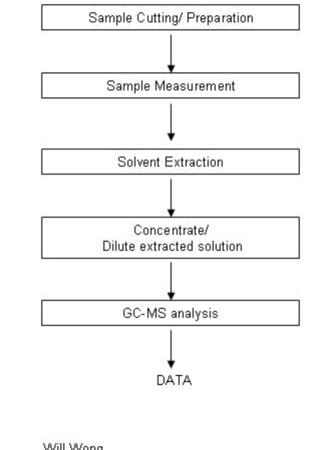
Test Report

No. HKTEC2102439302

Date: 28 Jun 2021

Flowchart for Organotin measurement

Method: ISO 17353



Tested by	40	Will Wong	
Checked by	3	Eunice Lau	31

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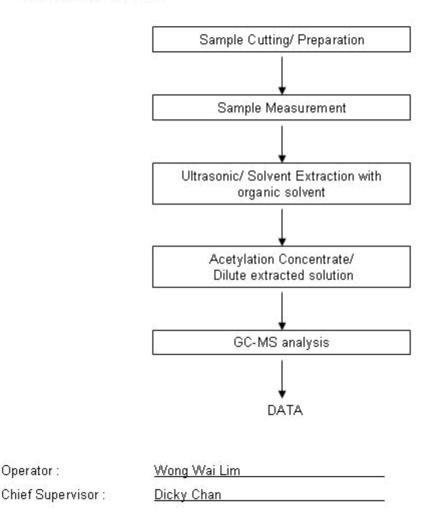
No. HKTEC2102439302

Date: 28 Jun 2021

Flowchart for TBBP-A measurement

Method: In-House method

Operator :



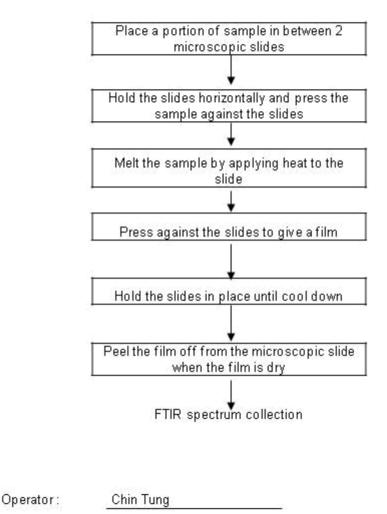
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Flowchart for FTIR



Supervisor: Chan Chun Kit, Dickson

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No. HKTEC2102439302 Date

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Sample photo:



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*** End of Report ***

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